

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF OKLAHOMA**

In Re:)	
)	
Charles Mark Williams,)	Case No. 20-80737
)	Chapter 7
)	
Debtor.)	

TRUSTEE'S OBJECTION TO DEBTOR(S) EXEMPTIONS

COMES NOW Charles Greenough, Chapter 7 Trustee herein, and objects to certain of the Debtor's exemptions claimed in Schedule C to the Petition filed in this case on July 30, 2020, and in support of such objection, states as follows:

1. This case was filed on July 30, 2020. Charles Greenough was appointed as Trustee on September 17, 2020.

2. The initial 341 Meeting of Creditors under the Chapter 7 case was held on September 14, 2020.

3. The Trustee objects to certain exemptions claimed by the Debtor as follows:

Because the Debtor did not reside in the State of Oklahoma on the date of the filing of the case, he is not claiming exemptions under Oklahoma State law but is instead claiming exemptions under 11 U.S.C. § 522(b)(2). On Schedule C to the Petition, Debtor claims twenty-two (22) separate assets as exempt under 11 U.S.C. § 522(d)(5). Because the Debtor does not claim any real estate as exempt homestead, the amount he may claim as exempt under this section is limited in dollar amount to a total of \$13,900. The total value listed in Schedule C by the Debtor in the 22 separate assets claimed exempt under § 522(d)(5) is approximately \$20,332.08, with one asset, a litigation claim, having a value of unknown. Accordingly, the Trustee objects to Debtor's claim of exemption in these 22 assets because the amount sought to be exempted exceeds the applicable statutory limitation. The specific assets covered by this

objection are marked on the copy of the Debtor's Schedule C filed in this case which is attached as Exhibit 1 and made a part hereof.

WHEREFORE, Charles Greenough, Chapter 7 Trustee, respectfully requests that the Court deny the Debtor's claims of exemption with respect to the property identified above.

s/ Charles Greenough

Charles Greenough, OBA #12311
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Fill in this information to identify your case:

Debtor 1	Charles Mark Williams		
	First Name	Middle Name	Last Name
Debtor 2			
(Spouse if, filing)	First Name	Middle Name	Last Name
United States Bankruptcy Court for the: <u>EASTERN DISTRICT OF OKLAHOMA</u>			
Case number _____ (if known)			

☐ Check if this is an amended filing

Official Form 106C

Schedule C: The Property You Claim as Exempt

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Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. Using the property you listed on *Schedule A/B: Property* (Official Form 106A/B) as your source, list the property that you claim as exempt. If more space is needed, fill out and attach to this page as many copies of *Part 2: Additional Page* as necessary. On the top of any additional pages, write your name and case number (if known).

For each item of property you claim as exempt, you must specify the amount of the exemption you claim. One way of doing so is to state a specific dollar amount as exempt. Alternatively, you may claim the full fair market value of the property being exempted up to the amount of any applicable statutory limit. Some exemptions—such as those for health aids, rights to receive certain benefits, and tax-exempt retirement funds—may be unlimited in dollar amount. However, if you claim an exemption of 100% of fair market value under a law that limits the exemption to a particular dollar amount and the value of the property is determined to exceed that amount, your exemption would be limited to the applicable statutory amount.

Part 1: Identify the Property You Claim as Exempt

1. Which set of exemptions are you claiming? Check one only, even if your spouse is filing with you.

☐ You are claiming state and federal nonbankruptcy exemptions. 11 U.S.C. § 522(b)(3)

☒ You are claiming federal exemptions. 11 U.S.C. § 522(b)(2)

2. For any property you list on *Schedule A/B* that you claim as exempt, fill in the information below.

Brief description of the property and line on <i>Schedule A/B</i> that lists this property	Current value of the portion you own <small>Copy the value from <i>Schedule A/B</i></small>	Amount of the exemption you claim <small>Check only one box for each exemption.</small>	Specific laws that allow exemption
2019 GMC Sierra 43,400 miles Vin# 1GTU9BED0KZ382446 Line from <i>Schedule A/B</i> : 3.1	\$28,912.00	<input type="checkbox"/> _____ <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 U.S.C. § 522(d)(2)
2 Bedroom suites, Couch, tables, refrigerator, washer, dryer - In Possession of Debtor(s) 1/2 Interest with spouse Line from <i>Schedule A/B</i> : 6.1	\$4,414.82	<input type="checkbox"/> _____ <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 U.S.C. § 522(d)(3)
TV - In Possession of Debtor(s) 1/2 Interest with spouse Line from <i>Schedule A/B</i> : 7.1	\$244.00	<input type="checkbox"/> _____ <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 U.S.C. § 522(d)(3)
Kayak - In Possession of Debtor(s) Line from <i>Schedule A/B</i> : 9.1	\$249.99	<input type="checkbox"/> _____ <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 U.S.C. § 522(d)(5)
9mm Pistol - In Possession of Debtor(s) Line from <i>Schedule A/B</i> : 10.1	\$500.00	<input type="checkbox"/> _____ <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 U.S.C. § 522(d)(5)

EXHIBIT

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Brief description of the property and line on Schedule A/B that lists this property	Current value of the portion you own Copy the value from Schedule A/B	Amount of the exemption you claim Check only one box for each exemption.	Specific laws that allow exemption
Colt AR-15 - In Possession of Debtor(s) Line from Schedule A/B: 10.2	\$1,100.00	<input checked="" type="checkbox"/> \$1,100.00 <input type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 U.S.C. § 522(d)(5)
12 gauge shot gun - In Possession of Debtor(s) Line from Schedule A/B: 10.3	\$900.00	<input type="checkbox"/> <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 U.S.C. § 522(d)(5)
Clothing - Shirts, shorts, jeans - In Possession of Debtor(s) Line from Schedule A/B: 11.1	\$200.00	<input type="checkbox"/> <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 U.S.C. § 522(d)(3)
Men's Wedding Ring - In Possession of Debtor(s) Line from Schedule A/B: 12.1	\$250.00	<input type="checkbox"/> <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 U.S.C. § 522(d)(4)
2 chihuahua/mix dogs 1/2 Interest with spouse Line from Schedule A/B: 13.1	\$75.00	<input type="checkbox"/> <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 U.S.C. § 522(d)(5)
Cash on hand Line from Schedule A/B: 16.1	\$180.00	<input type="checkbox"/> <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 U.S.C. § 522(d)(5)
Checking: Chase Bank - 2309 Line from Schedule A/B: 17.1	\$1,656.90	<input type="checkbox"/> <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 U.S.C. § 522(d)(5)
Checking: Wells Fargo - Line from Schedule A/B: 17.2	\$1,482.16	<input type="checkbox"/> <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 U.S.C. § 522(d)(5)
Savings: First National Bank & Trust -4138 Line from Schedule A/B: 17.3	\$168.43	<input type="checkbox"/> <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 U.S.C. § 522(d)(5)
Business Checking: First National Bank - 7324 Marietta Capital, LLC Line from Schedule A/B: 17.4	\$330.70	<input type="checkbox"/> <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 U.S.C. § 522(d)(5)
Business Checking: Chase Bank - 0991 Copano Partners, LLC Line from Schedule A/B: 17.5	\$22.01	<input type="checkbox"/> <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 U.S.C. § 522(d)(5)
Business Checking: Chase Bank - 7142 Barrett Energy Consultants, LLC Line from Schedule A/B: 17.6	\$4.60	<input type="checkbox"/> <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 U.S.C. § 522(d)(5)

Brief description of the property and line on Schedule A/B that lists this property	Current value of the portion you own Copy the value from Schedule A/B	Amount of the exemption you claim Check only one box for each exemption.	Specific laws that allow exemption
Savings: Chase Bank - 9291 Barrett Energy Consultants, LLC Line from Schedule A/B: 17.7	\$1.88	<input type="checkbox"/> <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 U.S.C. § 522(d)(5)
E*Trade - 6887 Line from Schedule A/B: 18.1	\$1,210.41	<input type="checkbox"/> <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 U.S.C. § 522(d)(5)
Stock: COT Oilfield Services 7% Line from Schedule A/B: 18.2	\$10,000.00	<input type="checkbox"/> <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 U.S.C. § 522(d)(5)
Silver Line Logistics 50 % ownership Line from Schedule A/B: 19.1	\$0.00	<input type="checkbox"/> <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 U.S.C. § 522(d)(5)
Barrett Energy Consultants LLC - Inactive 33 % ownership Line from Schedule A/B: 19.2	\$0.00	<input type="checkbox"/> <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 U.S.C. § 522(d)(5)
Marietta Capital, LLC - Closed 100 % ownership Line from Schedule A/B: 19.3	\$0.00	<input type="checkbox"/> <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 U.S.C. § 522(d)(5)
Silver Creek Services, Inc 50 % ownership Line from Schedule A/B: 19.4	\$0.00	<input type="checkbox"/> <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 U.S.C. § 522(d)(5)
Rental deposit: Don Goodwin Line from Schedule A/B: 22.1	\$2,450.00	<input type="checkbox"/> <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 U.S.C. § 522(d)(5)
Patent 10,082,015 - No Value as the Proof of Concept was never completed. Line from Schedule A/B: 26.1	\$0.00	<input type="checkbox"/> <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 U.S.C. § 522(d)(5)
Farmers New World Life Insurance Company - 5372 Term Life Policy Line from Schedule A/B: 31.1	\$0.00	<input type="checkbox"/> <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 U.S.C. § 522(d)(7)
Counter Claim of Fraud against Ashely & Babatunde Ajayi Ashley Ajayi and Babatunde Ajayi vs Charles Williams, Silver Creek Services, Inc, Silver Line Logistics, Inc., and Silver Creek Tools, Inc. Line from Schedule A/B: 33.1	Unknown	<input type="checkbox"/> <input checked="" type="checkbox"/> 100% of fair market value, up to any applicable statutory limit	11 U.S.C. § 522(d)(5)